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Attorneys for Matrix Financial Services Corporation
L&A Case No. 20.77804.3

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH
Central Division

In re:	Bankruptcy No. 20-25409 JTM
Douglas Lee Wren and Julia Baumann Wren,	(a Chapter 13 case)
Debtors.	Filed Electronically

OBJECTION TO CONFIRMATION

Matrix Financial Services Corporation (“Creditor”), a secured creditor of the above-referenced debtor, objects to confirmation of the Chapter 13 Plan (the “Plan”) because the Plan incorrectly states the amount of Creditor’s claim of \$9,223.38 and because the Plan is not feasible.

The Plan as proposed would distribute the payment of \$665.00 per month as follows: \$66.50 to the Chapter 13 Trustee, \$40.00 to Suntrust Bank/Green Sky and \$7.00 to Utah State Tax Commission, \$359.50 per month for 9 months to pay the remaining attorney fees of \$3,184.00. Creditor does not believe that this Plan, taking 9 months to pay the remaining

attorney fees, and another 55 months to cure the arrears, for a total of 65 months, complies with 11 U.S.C. § 1322(b)(5).

DATED: October 1, 2020.

LUNDBERG & ASSOCIATES, PC

By: /s/Mark S. Middlemas

Mark S. Middlemas
Attorneys for Creditor

CERTIFICATE OF SERVICE – BY NOTICE OF ELECTRONIC FILING (CM/ECF)

I certify that, on October 1, 2020 I electronically filed the foregoing Objection, with the United States Bankruptcy Court for the District of Utah by using the CM/ECF system. I further certify that the parties of record in this case, as identified below, are registered CM/ECF users and will be served through the CM/ECF system:

Matthew K. Broadbent
Vannova Legal, PLLC
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ECF
Attorney for Debtors

Lon Jenkins
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ECF
Chapter 13 Trustee

/s/Mark S. Middlemas
Mark S. Middlemas

CERTIFICATE OF SERVICE – MAIL, OTHER

I certify that, on October 1, 2020 I caused to be served a true and correct copy of the forgoing Objection, as follows:

Mail Service – By regular first class United States mail, postage fully pre-paid addressed to:

Douglas Lee Wren
Julia Baumann Wren
453 8th Avenue
Salt Lake City, UT 84103
Debtors

/s/Mark S. Middlemas
Mark S. Middlemas